

## Comments on NOI 03-104, Broadcast Over Power Line

I have serious concerns with proposals to implement or expand Broadcast Over Power Line (BPL) on the frequencies of 1.7-80 MHz.

The proposed frequencies are a poor choice, as the potential for interference to licensed users is great, and also because power lines are designed as a transmission, or feedline, for 60 cycle AC power. They are *not* designed to contain bona fide RF power in the region of 1.7 –80 MHz. BPL signals *will* leak and be transmitted from AC building wiring and overhead lines.

The MF/HF frequencies up to 30 MHz contain Shortwave, Amateur, Military and Homeland Security users.

I have been licensed as an Amateur since 1980. I have noticed the steady creep of increased RF noise on HF frequencies since then.

Computers and other consumer products filled with crystal oscillators, microprocessors, and other incidental sources of RF noise have made it increasingly difficult to conduct licensed operations.

Just this weekend, I was barely able to hear the museum ship USS Hornet (NB6GC) on 14.320 MHz due to strong interference from some consumer electronic item in a nearby house.

By allowing BPL transmissions on the proposed 1.7-80 MHz frequency range, I believe that the heavy interference that is now present on the HF frequencies will increase by orders of magnitude, ruining MF/HF and low VHF weak signal work.

I am also concerned with the interference to 40 MHz Public Safety radio systems, the 50-54 MHz Amateur band, as well as channels 2-5 VHF television in weak signal areas.

I would ask that BPL not be allowed on 1.7-80 MHz. If BPL is to be allowed, it should be located in the microwave frequency region along with other license free services that will not interfere with MF-VHF services, or other licensed users.

Should BPL be allowed in the 1.7-80 MHz range, the electric utility companies or whoever operates these systems should be compelled under law to protect licensed users from interference from BPL systems, as even Part 15 limits on emission from a BPL system can cause severe interference to licensed users.

Thank you for the opportunity to comment on this NOI.

Sincerely, Tom Herman, CETma  
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